

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS**

MATTHEW J. PEASE,

Plaintiff,

V.

CASE NO. 24-cv-00322-DC-RCG

**SECURITIES AND EXCHANGE
COMMISSION, et al.**

Defendants.

**CONSENT MOTION FOR EXTENSION OF TIME TO RESPOND TO THE SECOND
AMENDED COMPLAINT**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure (“FRCP”), Defendant Securities and Exchange Commission (“SEC” or “Commission”) requests a 30-day extension of time to May 7, 2025¹ to respond to Plaintiff’s Second Amended Complaint (ECF 12).

In support of this motion, the Commission states as follows:

1. This motion is the Commission's first request for an extension of time with respect to this time limitation.
2. Counsel for the Commission has conferred with pro se Plaintiff, and he consented to the requested extension of the deadline to respond to the Second Amended Complaint. No other party has made an appearance at this time.
3. The Commission requests the additional time to prepare its response to the

¹ Plaintiff served the United States Attorney's Office for the Western District of Texas on February 6, 2025. Therefore, pursuant to FRCP Rule 12(a)(2), the Commission's response would be due April 7, 2025 absent an extension.

Second Amended Complaint because of its breadth. On February 26, 2025, Plaintiff filed a Second Amended Complaint. The Second Amended Complaint is 93 pages with 328 numbered allegations. The Second Amended Complaint further has 17 counts and seeks declaratory relief on a variety of statutory and constitutional bases.

WHEREFORE, the Commission respectfully moves for an extension of time from April 7, 2025, to and including May 7, 2025, to move to dismiss or otherwise respond to the Second Amended Complaint.

Respectfully Submitted,

Date: March 4, 2025

/s/ Eric A. Reicher

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** Admitted Pro Hac Vice

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of March, 2025, I filed or caused to be filed the foregoing through the CM/ECF system which will provide service to counsels of record and I will provide a copy to Plaintiff if he does not receive notice through the CM/ECF system.

/s/ Eric A. Reicher

Eric A. Reicher

Special Trial Counsel

U.S. Securities and Exchange Commission